



August 2, 2023

**VIA ECF**

Hon. Robert W. Lehrburger, U.S.M.J.  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re:** *Trustees of the New York City District Council of Carpenters Pension Fund v. Theodore Williams Construction Company, LLC, 22 CV 9645 (GHW) (RWL)*

Dear Magistrate Judge Lehrburger:

This firm represents the Plaintiff in the above-referenced case. We write jointly with counsel for the Defendant to request a two-week extension of the August 3, 2023 deadline to submit the parties' pre-motion letters following the close of fact discovery, with a corresponding adjournment of the following deadline to file. Counsel for the parties have engaged in preliminary settlement discussions and anticipate knowing within two weeks whether the parties will move for summary judgment or seek to resolve this matter via settlement. This is the first request for an extension of a deadline in this case.

We thank the Court for its time and attention to this matter.

Sincerely,

VIRGINIA & AMBINDER LLP

Granted.

SO ORDERED:

8/2/2023

HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE

/s/ Maura Moosnick  
By: Maura Moosnick, Esq.  
*Attorneys for Plaintiff*

DAVID HOROWITZ, P.C.

/s/ Christopher Joslin  
By: Christopher S. Joslin, Esq.

*Attorneys for Defendant*